

In the Matter of:

ESTATE OF PATRICK HARMON, SR., et al.

vs.

SALT LAKE CITY, et al.

TASHA LASHONDA SMITH

November 10, 2022

RED ROCK REPORTING

P.O. BOX 3265
SALT LAKE CITY, UT 84110
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IN THE UNITED STATES DISTRICT COURT

STATE OF UTAH, CENTRAL DIVISION

ESTATE OF PATRICK)	
HARMON, SR.; PATRICK)	
HARMON, II, as Personal)	
Representative of the)	Zoom Videoconference
Estate of Patrick)	Deposition of:
Harmon, Sr., and heir)	
of Patrick Harmon, Sr.;)	TASHA LASHONDA SMITH
TASHA SMITH, as heir)	
of Patrick Harmon, Sr.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:19-cv-00553-HCN-CMR
SALT LAKE CITY, a)	
municipality; and)	
OFFICER CLINTON FOX,)	
in his individual)	Hon. Howard C. Nielson, Jr.
capacity,)	
)	
Defendants.)	

November 10, 2022 * 9:06 a.m.

Location:

1422 Angelica Street
 St. Louis, Missouri

Reporter: Susette M. Snider, CSR, CRR, RPR

A P P E A R A N C E S

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E X H I B I T S

(None marked)

P R O C E E D I N G S

TASHA LASHONDA SMITH,
having been first duly sworn,
was examined and testified as follows:

EXAMINATION

BY MS. NICHOLS:

Q. Ms. Smith, thank you for being here today.
My name is Katie Nichols. I represent the
defendants in this matter.

What is your full name?

A. Tasha Smith.

Q. Do you have a middle name?

A. Yes, ma'am. LaShonda.

Q. I have a number of questions for you today
related to this case. And I recognize that these
topics may be difficult or painful. It's not my
intention to cause you any distress. If at any point
you would like to take a break, that's perfectly
fine. Just let me know. I would ask that if there's
any questions pending that you finish answering those
before we take a break.

Does that make sense?

A. Yes, ma'am.

1 Q. Where do you currently live?

2 A. St. Hughes, Missouri.

3 Q. Who do you live with?

4 A. Myself and my kids.

5 Q. How many kids do you have?

6 A. I have three.

7 Q. How long have you lived in St. Louis?

8 A. My whole life.

9 Q. You've never lived outside of St. Louis
10 City?

11 A. No.

12 Q. How long have you lived in that particular
13 location, in that home?

14 A. Two years.

15 Q. What is your date of birth?

16 A. January 28, 1991.

17 Q. Do you have a spouse or partner?

18 A. No, ma'am.

19 Q. Have you ever been involved in a lawsuit
20 or court case before?

21 A. No.

22 Q. Have you ever been deposed before?

23 A. I don't understand.

24 Q. Have you ever -- this is a deposition.

25 Have you ever participated at a deposition like this

1 before?

2 A. No.

3 Q. I have a number of questions for you about
4 your father. Obviously, you can only answer what you
5 know, so if you don't know a particular question,
6 that's perfectly fine to say.

7 A. Okay.

8 Q. Was Patrick Harmon, Sr., your biological
9 father?

10 A. Yes.

11 Q. What is the name of your mother?

12 A. Antoinette Baldwin.

13 Q. Were your mother and father married?

14 A. No.

15 Q. Do you know, were they in a relationship?

16 A. Yes.

17 Q. Do you know for how long?

18 A. Two years.

19 Q. Do you know the years of that
20 relationship?

21 A. No, ma'am.

22 Q. Were they together at the time that you
23 were born in 1991?

24 A. Yes.

25 Q. Do you know if they ever lived together?

1 A. Yes.

2 Q. Is your mother living?

3 A. Yes, she is.

4 Q. Do you know if she was in contact with
5 Mr. Harmon in the years prior to his death?

6 A. Just through me.

7 Q. Where was Mr. Harmon born?

8 A. In St. Louis, Missouri.

9 Q. And where did he live growing up?

10 A. In the city of St. Louis.

11 Q. Do you know if he lived outside of
12 St. Louis before the age of 18?

13 A. No, I don't know.

14 Q. How many siblings do you have?

15 A. From my dad's?

16 Q. Yes.

17 A. I think it's five.

18 Q. Do you know their names?

19 A. Yes. My Aunt Helen, my Uncle Curt -- his
20 name is Curtis -- my Uncle Chris, Uncle Rodney and
21 Sheila.

22 Q. Have you met all of them --

23 A. Yes.

24 Q. -- in person?

25 Are all of them still living?

1 A. All except two.

2 Q. Which ones are deceased?

3 A. Curtis and Sheila.

4 Q. Did you live in the same house as

5 Mr. Harmon when you were growing up?

6 A. For a short time.

7 Q. Do you know for how long?

8 A. Probably, about, I'd say, six months to a
9 year.

10 Q. Was that the first six months to a year of
11 your life?

12 A. Yes.

13 Q. After the age of one, did you ever live in
14 the same home as Mr. Harmon?

15 A. No.

16 Q. When you were growing up, before the age
17 of 18, who else did you live with?

18 A. My mother.

19 Q. Anyone else?

20 A. No.

21 Q. Do you have any siblings?

22 A. Yes.

23 Q. How many?

24 A. On my father's side, one sibling, which is
25 Patrick, and then my mother's side, I have four.

1 MS. NICHOLS: Sorry. Let's just pause for
2 a moment. It looks like we lost Mr. Lutz, so let's
3 just wait for him to log back on.

4 And we can be off the record for this.

5 (Recess from 9:12 a.m. to 9:13 a.m.)

6 MS. NICHOLS: Let's go back on the record.
7 Susette, could you read back the last
8 question?

9 (The record was read as follows:

10 "Question: Do you have any siblings?

11 "Answer: Yes.

12 "Question: How many?

13 "Answer: On my father's side, one
14 sibling, which is Patrick, and then my mother's
15 side, I have four.")

16 Q. (By Ms. Nichols) Did you live with the
17 four siblings on your mother's side growing up?

18 A. Yes.

19 Q. Are they older or younger than you?

20 A. They're older.

21 Q. Did your mother ever have a spouse or
22 partner that lived in the home with you growing up?

23 A. Yes.

24 Q. How many spouses or partners?

25 A. There was one.

1 Q. What was the name of that person?

2 A. Mark Smith.

3 Q. Do you consider Mr. Smith your father or
4 stepfather?

5 A. Stepfather, yes.

6 Q. Did you take his last name?

7 A. Yes.

8 Q. At what age did you take his last name?

9 A. I think it was, like, three or four, after
10 they got married.

11 Q. Were you -- was your name at birth -- your
12 last name at birth Harmon?

13 A. Yes.

14 Q. Was it your decision to take his last
15 name?

16 A. No.

17 Q. How would you describe your relationship
18 with your father when you were growing up?

19 A. We didn't really have a relationship until
20 I got older.

21 Q. Did you have any contact with him after
22 the age of one through the age of eighteen?

23 A. No. I think -- I didn't start talking to
24 my father until about 20 -- until I was in my 20s, 21
25 or something, if I'm not mistaken.

1 Q. Sorry. What was the last thing you said?

2 A. About 21.

3 MS. NICHOLS: And just to confirm,

4 Mr. Lutz, are you able to hear us?

5 MR. LUTZ: Yep.

6 MS. NICHOLS: Okay.

7 MR. LUTZ: Good to go.

8 Q. (By Ms. Nichols) How did you get in touch
9 with Mr. Harmon when you were in your 20s?

10 A. My uncle -- my uncle saw my mother, and
11 that's how we got in contact again. My mother got my
12 father's number from his brother.

13 Q. Which uncle?

14 A. My Uncle Curt, Curtis.

15 Q. After your mother got your -- got
16 Mr. Harmon's number, did you reach out to Mr. Harmon?

17 A. Yes.

18 Q. Did you reach out to him on the phone?

19 A. Yes.

20 Q. Do you recall when that first conversation
21 occurred?

22 A. Yes.

23 Q. When was that?

24 A. Had to have been -- I'm not sure the date.

25 Q. Sometime when you were in your early 20s?

1 A. Yes.

2 Q. Can you describe that first conversation
3 with him?

4 A. He was excited; I was excited. He was
5 kind taken aback because I called him, I reached out.
6 So it was really emotional, because I had been
7 waiting to see him, also, and talk to him and get to
8 know him and just see my father.

9 Q. Had you made efforts to locate your father
10 prior to that time?

11 A. Yes. I would try to type his name into
12 Facebook.

13 Q. Were you ever able to locate him?

14 A. No. I just kept finding Patrick, Jr., but
15 I wasn't sure.

16 Q. Growing up, did you have any contact with
17 Patrick, Jr.?

18 A. No.

19 Q. When did you first learn that you were
20 related to Patrick, Jr.?

21 A. When I spoke with my father.

22 Q. In that first conversation?

23 A. Yes.

24 Q. Do you know at the time of that first
25 conversation where Mr. Harmon was or where he was

1 living?

2 A. He was in Utah, Salt Lake City, Utah.

3 Q. Were you surprised to hear he was in Utah?

4 A. No.

5 Q. After that first conversation, how many
6 times did you have phone conversations with him?

7 A. Almost every day.

8 Q. For how long?

9 A. How long was the conversations?

10 Q. I'm sorry. That was a bad question.

11 For what period of time did you talk to
12 him almost every day?

13 A. Well, probably about 10, 20 minutes,
14 depending on how busy we were.

15 Q. And when you say you talked to him almost
16 every day, did that continue for several weeks or
17 several months?

18 A. That continued until my father passed.

19 Q. So how many years would that have been
20 from the time that you first connected with him until
21 the date he passed?

22 A. About four years.

23 Q. Did you ever see him in person?

24 A. Yes.

25 Q. How many times?

1 A. I saw him in person twice.

2 Q. Do you recall the dates of those meetings?

3 A. No.

4 Q. Where did you meet him?

5 A. At my house.

6 Q. In St. Louis?

7 A. Yes.

8 Q. Do you know, was he living in St. Louis at
9 the time?

10 A. No. He had come to visit.

11 Q. Do you recall the approximate years that
12 those visits took place?

13 A. I know when I first -- when I was in my
14 early 20s, that's when I first met him. So he came
15 to see me within that first year, and he stayed about
16 a week.

17 Q. Do you recall the second visit, how long
18 after the first one it was?

19 A. About five months.

20 Q. How long did the second visit last?

21 A. Three days.

22 Q. Did he stay with you during that time?

23 A. Yes, and his sister.

24 Q. And his sister?

25 A. Yes.

1 Q. You sort of split time between both of
2 your places?

3 A. Yes.

4 Q. Prior to reconnecting with him in your
5 early 20s, did you know his five siblings?

6 A. Before I met him?

7 Q. Yes.

8 A. No.

9 Q. So you connected with him around the
10 same -- let me start over.

11 You connected with his siblings around the
12 same time as you connected with him; is that right?

13 A. Yes.

14 Q. How would you describe those visits that
15 you had with him?

16 A. Exciting, emotional, happy.

17 Q. Did he have a chance to meet your
18 children?

19 A. Yes.

20 Q. Did you ever travel to visit him in Utah
21 or anywhere else?

22 A. No.

23 Q. Did Mr. Harmon serve any time in jail or
24 prison?

25 A. To my knowledge, yes.

1 Q. Do you know if he served time on more than
2 one occasion?

3 A. No, I don't know.

4 Q. Do you know for how long he served?

5 A. No.

6 Q. Do you know for what reason he was
7 serving?

8 A. No.

9 Q. Do you know where he was in jail or
10 prison?

11 A. No.

12 Q. You didn't ever visit him while he was in
13 jail or prison?

14 A. No.

15 Q. In the Complaint it states, "Mr. Harmon
16 did not lead a perfect life."

17 Did you write that?

18 A. No.

19 Q. What does that mean to you?

20 A. I guess he made some mistakes in his life,
21 and I guess that's what made him not perfect, I
22 guess.

23 Q. Let me ask, do you agree with that
24 statement?

25 A. No.

1 Q. Why don't you agree with that statement?

2 A. Because -- I don't agree with it because I
3 feel like it's down-talking my father.

4 Q. The Complaint also states, "Prior to his
5 death, he had found renewed spirituality."

6 What did that mean?

7 A. He had found a religion.

8 Q. Do you know when that occurred?

9 A. No.

10 Q. Did you speak with Mr. Harmon about his
11 renewed spirituality?

12 A. No.

13 Q. When did you first connect directly with
14 Patrick, Jr.?

15 A. Within the first week I spoke with my dad.

16 Q. Did you reach out to Patrick, Jr.?

17 A. Yes.

18 Q. What was his reaction when you reached
19 out?

20 A. He was happy.

21 Q. Do you know if he had spoken to Mr. Harmon
22 at the time you reached out?

23 A. Yes.

24 Q. Did he reconnect with Mr. Harmon around
25 the same time you did, as far as you know?

1 A. No. I don't know.

2 Q. Prior to reconnecting with your father in
3 your early 20s, had you had any communication with
4 him at all since you were about one year old?

5 A. No.

6 Q. Did you receive any letters or postcards
7 or anything like that?

8 A. No.

9 Q. Would you be able to estimate how many
10 times you spoke with Mr. Harmon after the time you
11 reconnected with him?

12 A. No. It was a lot, but I can't recall the
13 exact number.

14 Q. How did you communicate with him? Was it
15 exclusively phone calls, or were there text messages,
16 letters, or other forms of communication?

17 A. A phone.

18 Q. You never texted with him?

19 A. No.

20 Q. Do you know where Mr. Harmon was living at
21 the time of his death?

22 A. To my knowledge, with his girlfriend.

23 Q. Do you know her name?

24 A. No. I can't remember.

25 Q. Did you ever meet her?

1 A. No. I spoke to her on the phone a couple
2 times.

3 Q. Was that in Utah?

4 A. Yes. I think, yes.

5 Q. Did Mr. Harmon ever experience periods of
6 homelessness?

7 A. I don't know.

8 Q. Do you have any photographs of your
9 father?

10 A. Yes.

11 Q. Are they photographs that you took?

12 A. No.

13 Q. Do you have any photographs that you took
14 of your father?

15 A. No.

16 Q. Where did you get the photographs that you
17 do have?

18 A. My aunt.

19 Q. Which aunt is that?

20 A. Helen Harmon.

21 Q. How would you describe Mr. Harmon's
22 physical health at the time of his death?

23 A. Healthy to my --

24 MR. LUTZ: Foundation.

25 MS. NICHOLS: I'm sorry. Mr. Lutz, I

1 couldn't hear your objection.

2 MR. LUTZ: Objection to foundation.

3 Q. (By Ms. Nichols) Sorry. Ms. Smith, could
4 you answer again?

5 A. Could you repeat the question?

6 Q. Sure. Let's start that over.

7 How would you describe Mr. Harmon's
8 physical health at the time of his death?

9 A. I don't know. I think healthy.

10 Q. Do you know if he saw a doctor regularly?

11 A. No, I don't know.

12 Q. Do you know if he had been diagnosed with
13 my diseases, chronic illnesses or conditions?

14 A. No.

15 Q. I'm sorry. No, you don't know, or no, he
16 was not diagnosed?

17 A. No, I don't know.

18 Q. Have Mr. Harmon's -- and these are all
19 just going to be to the best of your knowledge.

20 Had Mr. Harmon ever been diagnosed with
21 any mental health conditions?

22 A. No. Not that I know of.

23 Q. Did you ever suspect that he might have an
24 undiagnosed mental health condition?

25 A. I don't know.

1 Q. Has anyone in your family ever told you
2 they suspected he had an undiagnosed mental health
3 condition?

4 A. No.

5 Q. Did Mr. Harmon smoke tobacco?

6 A. When I seen him, no.

7 Q. Did he drink alcohol?

8 A. I don't know.

9 Q. Did he use prescription drugs?

10 A. I don't know.

11 Q. Did he use any drugs that required a
12 prescription for which he did not have a
13 prescription?

14 A. I don't know.

15 Q. Did he use any illegal drugs?

16 A. I don't know.

17 Q. Do you know if Mr. Harmon was ever treated
18 for substance abuse or use disorder?

19 A. I don't know.

20 Q. How old was your father when he died?

21 A. I don't know. I don't remember.

22 Q. Okay. When was his birthday?

23 A. Birthday is August 14th?

24 Q. Do you remember what year?

25 A. No.

1 Q. Aside from yourself and Patrick, Jr., do
2 you know if Mr. Harmon had any other biological
3 children?

4 A. I don't know.

5 Q. Do you know if he had any adopted
6 children?

7 A. I don't know.

8 Q. Do you know if he had any dependents at
9 the time of his death?

10 A. No, I don't know. Would we be, like,
11 dependents?

12 Q. Aside from you and Patrick, Jr., anyone
13 else that was financially depending on him?

14 A. No, I don't know.

15 Q. Do you know if Mr. Harmon had a trust or
16 will or anything like that when he died?

17 A. No, I don't know.

18 Q. Do you have any information about
19 Mr. Harmon's finances in the years before his death
20 or at the time of his death?

21 A. No.

22 Q. Do you know if he was employed in the
23 years before his death?

24 A. He told me he was, but I'm not sure.

25 Q. What did he tell you as far as his

1 employment?

2 A. That he was working at, like, a warehouse.

3 Q. In Utah?

4 A. I guess, yeah. That's what he say.

5 Q. Did he have any other employment besides
6 the warehouse?

7 A. No.

8 Q. Did he ever provide you with any financial
9 assistance?

10 A. Yes.

11 Q. When did that occur?

12 A. When my gas was cut off.

13 Q. Do you know the approximate date?

14 A. No.

15 Q. Do you know how long it was after you
16 reconnected with him that he provided that
17 assistance?

18 A. Oh, probably about five or six months.

19 Q. And how much money did he provide?

20 A. He sent me 230-something, because my gas
21 got cut off, so about 230-odd dollars.

22 Q. Aside from that time, did he provide you
23 any other financial assistance?

24 A. Probably for gas money or something.

25 Q. How much total did he provide you?

1 A. All together, probably about \$500.

2 Q. Do you know what assets Mr. Harmon had at
3 the time of his death?

4 A. No.

5 Q. Do you know if he filed tax returns in the
6 years prior to his death?

7 A. No, I don't.

8 Q. After Mr. Harmon's death, did you receive
9 anything that belonged to him?

10 A. Ashes.

11 Q. Anything else?

12 A. No. Just pictures and ashes.

13 Q. What types of monetary damages are you
14 seeking in this litigation?

15 MR. LUTZ: Objection. Calls for a legal
16 conclusion.

17 Go ahead, Tasha.

18 THE WITNESS: What is "monetary"?

19 Q. (By Ms. Nichols) Let me be a little more
20 specific. You're seeking money from defendants in
21 this lawsuit, correct?

22 A. Yes.

23 Q. Are you seeking money for loss of
24 companionship or loss of consortium with Mr. Harmon?

25 MR. LUTZ: Objection. Calls for a legal

1 conclusion.

2 Q. (By Ms. Nichols) You can go ahead and
3 answer.

4 A. Yes.

5 Q. Are you seeking a specific dollar amount
6 for that?

7 A. No.

8 Q. Are you seeking money for the loss of
9 financial support from your father?

10 A. Yes.

11 Q. Are you seeking a specific dollar amount
12 for that?

13 A. No.

14 Q. Are you seeking money for loss or
15 reduction of inheritance?

16 A. No.

17 Q. Are you seeking money for pain and
18 suffering?

19 A. Yes.

20 Q. Are you seeking a specific amount for
21 that?

22 A. No.

23 MR. LUTZ: Objection. Calls for a legal
24 conclusion.

25 Q. (By Ms. Nichols) And are you seeking

1 punitive damages?

2 A. Punitive, yes.

3 MR. LUTZ: Objection. Calls for a legal
4 conclusion.

5 Q. (By Ms. Nichols) Let me try again. Are
6 you seeking money for the purpose of punishment of
7 defendants?

8 MR. LUTZ: Same objection.

9 Q. (By Ms. Nichols) Sorry. You can go ahead
10 and answer that question.

11 A. Yes.

12 Q. Are you seeking a specific amount for
13 that?

14 A. No, ma'am.

15 Q. Ms. Smith, have you watched any of the
16 body cam videos of the incident?

17 A. Yes.

18 Q. Which of the videos have you watched?

19 A. All of them.

20 Q. When did you first watch them?

21 A. On Facebook.

22 Q. Do you know approximately when that was?

23 A. In 2017.

24 Q. Do you know how many times you have
25 watched them?

1 A. No, not specifically.

2 Q. Multiple times?

3 A. Yes.

4 MR. LUTZ: Susette, I'd like the record to
5 reflect that Ms. Smith is in tears.

6 Q. (By Ms. Nichols) Ms. Smith, I do have a
7 couple of questions about the incident and understand
8 this is a painful topic. Would you like to take a
9 break for a minute?

10 A. No, ma'am.

11 Q. Okay. If you would like to, please let me
12 know.

13 A. Okay.

14 Q. Are you aware that Officer Clinton Fox
15 says that he saw a knife in Mr. Harmon's hand?

16 MR. LUTZ: Object to foundation.

17 THE WITNESS: Yes, I'm aware.

18 Q. (By Ms. Nichols) Are you aware that a
19 knife can be seen next to Mr. Harmon's hand after he
20 falls to the ground?

21 MR. LUTZ: Same objection.

22 Q. (By Ms. Nichols) I'm sorry. What was
23 your answer, Ms. Smith?

24 A. I'm aware.

25 Q. Is it your position that Mr. Harmon did

1 not have a knife in his hand when Officer Fox fired
2 his weapon?

3 A. Yes.

4 Q. Where would the knife on the ground come
5 from?

6 MR. LUTZ: Objection. Calls for
7 speculation and lack of foundation.

8 THE WITNESS: I don't know.

9 Q. (By Ms. Nichols) Do you believe it was
10 already on the ground when Mr. Harmon fell?

11 MR. LUTZ: Same objections.

12 THE WITNESS: I don't know.

13 Q. (By Ms. Nichols) I'm sorry. Your answer
14 was "I don't know"?

15 A. Yes.

16 Q. Do you believe one of the officers planted
17 the knife on the ground?

18 A. I don't know.

19 MR. LUTZ: Same objections.

20 Q. (By Ms. Nichols) Do you know if
21 Mr. Harmon was right-handed or left-handed?

22 A. No.

23 Q. Do you believe that Officer Fox should not
24 have fired his weapon when he did?

25 MR. LUTZ: Objection. Calls for a legal

1 conclusion.

2 Q. (By Ms. Nichols) You can answer.

3 A. Can you repeat the question?

4 Q. Sure.

5 Do you believe Officer Fox should not have
6 fired his weapon when he did?

7 A. Yes.

8 Q. What is your contention that he should
9 have done instead?

10 MR. LUTZ: Same objection. Calls for a
11 legal conclusion and speculation.

12 Go ahead, Tasha.

13 THE WITNESS: Should have waited.
14 Should -- I feel like he should have waited. He
15 should have figured out what was going on first.

16 Q. (By Ms. Nichols) Did you give any
17 interviews or statements regarding the incident or
18 Mr. Harmon's death?

19 A. No.

20 Q. Do you know if any members of your family
21 did?

22 A. My father's side, yeah.

23 Q. Ms. Smith, do you have any social media
24 accounts?

25 A. Yes.

1 Q. What accounts do you have?

2 A. Facebook, Instagram.

3 Q. Do you have a Twitter account?

4 A. No.

5 Q. Have you ever posted on those accounts
6 about the incident?

7 A. Facebook.

8 Q. Have you ever posted on those accounts
9 about your father separate from the incident?

10 A. Yeah, like his birthdays or Father's Day.

11 Q. Did Mr. Harmon have a Facebook account?

12 A. No, I don't think so.

13 MS. NICHOLS: I think I might be done.

14 Could we take a short break so I can double-check my
15 notes?

16 MR. LUTZ: Yeah.

17 MS. NICHOLS: Mr. Lutz, did you want to --
18 I only need two minutes, but if you need a little bit
19 more time, that's fine with me.

20 MR. LUTZ: Two minutes is great with me.

21 MS. NICHOLS: All right. We'll go off the
22 record. Thank you.

23 (Recess from 9:43 a.m. to 9:44 a.m.)

24 MS. NICHOLS: Okay. Let's go back on the
25 record.

1 Ms. Smith, I don't have any more questions
2 for you.

3 Mr. Lutz, I'll turn it over to you if you
4 have anything.

5 MR. LUTZ: I don't have anything
6 additional for Ms. Smith.

7 MS. NICHOLS: Ms. Smith. Thank you for
8 participating.

9 THE WITNESS: Thank you for hearing me
10 out. Have a great day.

11 MS. NICHOLS: You too.

12 MR. LUTZ: Thank you, Susette.

13 (The deposition concluded at 9:45 a.m.)

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REPORTER'S CERTIFICATE

I, Susette M. Snider, Certified Shorthand Reporter, Certified Shorthand Reporter and Registered Professional Reporter do hereby certify:

That prior to being examined, the witness, Tasha LaShonda Smith, was by me duly sworn to tell the truth, the whole truth, and nothing but the truth;

That said deposition was taken down by me in stenotype on November 10, 2022, via Zoom videoconference and was thereafter transcribed and that a true and correct transcription of said testimony is set forth in the preceding pages in accordance with my ability to hear and understand the Zoom videoconference audio;

I further certify that a reading copy was sent to Nicholas A. Lutz, Attorney at Law, for the witness to read and sign and then return to me for filing with Katherine R. Nichols, Attorney at Law.

I further certify that I am not kin or otherwise associated with any of the parties to said cause of action and that I am not interested in the outcome thereof.

WITNESS MY HAND this 30th day of November, 2022.



Susette M. Snider, CSR, CRR, RPR

1 I, TASHA LASHONDA SMITH, HEREBY DECLARE:
5 That I am the witness in the foregoing
transcript; that I have read the transcript and know
6 the contents thereof; that with these corrections I
have noted this transcript truly and accurately
7 reflects my testimony.

19 _____ No corrections were made.
20

25 Date:

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